

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

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In re GROUPON, INC. SECURITIES LITIGATION

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Master File No.: 12 CV 2450

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CLASS ACTION  
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This Document Relates To  
ALL CASES

: Hon. Charles R. Norgle  
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**STIPULATION AND [PROPOSED] ORDER REGARDING SCHEDULING FOR  
BRIEFING OF LEAD PLAINTIFF'S AMENDED MOTION  
FOR CLASS CERTIFICATION**

Subject to this Court's approval, the parties have agreed to the following stipulation:

1. The motion for class certification filed by Lead Plaintiff Michael Carter Cohn ("Lead Plaintiff") on September 26, 2013 consistent with *Damasco v. Clearwire Corp.*, 662 F.3d 891 (7th Cir. 2011) (*see* Doc. No. 159) shall be entered and continued. The presentment of said motion previously noticed for October 4, 2013 is hereby withdrawn and no appearance shall be necessary.

2. Lead Plaintiff shall amend and supplement his motion for class certification no later than December 6, 2013.

3. Defendants Groupon, Inc. and Jason Child, Joseph M. Del Preto, Kevin Efrusy, Eric P. Lefkowsky, Theodore J. Leonsis, Andrew D. Mason, Howard Schultz, Morgan Stanley & Co. LLC, Goldman, Sachs & Co., and Credit Suisse Securities (USA) LLC (collectively,

“Defendants”) shall file their response[s] to Lead Plaintiff’s amended class certification motion no later than March 6, 2014.

4. Lead Plaintiff shall file any reply in support of an amended class certification motion no later than April 21, 2014.

5. The parties shall work together to schedule class discovery as necessary to accommodate this schedule. Nothing in this schedule shall prevent any party from commencing class discovery at any time.

6. The parties agree that there is good cause to enter this stipulated schedule, and it will not prejudice any party.

STIPULATED AND AGREED this 2<sup>nd</sup> day of October 2013:

/s/ Joshua B. Silverman

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SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2013

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Hon. Charles R. Norgle, Sr.  
United States District Judge